

## DISTRICT ATTORNEY

COUNTY OF NEW YORK

ONE HOGAN PLACE

New York, N. Y. 10013

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CYRUS R. VANCE, JR.

DISTRICT ATTORNEY

July 19, 2017

The Honorable Katherine Polk Failla  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: 17 CV 4755

*Beierwaltes v Director General of Antiquities of the  
Lebanese Republic*

Dear Judge Failla,

On June 29, 2017, I advised Your Honor that pursuant to a criminal investigation, this Office intended to apply for a warrant to seize the subject Greek archaic marble Head of a Bull ("Bull's Head") as stolen property. We did so on July 6, 2017. I also noted that I would inform this Court and counsel should this Office determine after seizure to repatriate the Bull's Head to the Republic of Lebanon prior to the conclusion of the matter before Your Honor.

On July 18, 2017, this Office received a formal demand from Lebanon's Minister of Culture for the return of the Bull's Head to the Lebanese Republic as its proper owner. See attached. This demand triggers Penal Law §450.10, which requires the return of the Bull's Head to the Republic of Lebanon "unless extended by a court order." Whenever such a request is made, "the property shall be retained until... the expiration of a fifteen-day period from receipt by defendant or his counsel of the notice of the request." I have notified Mr. Lederman of Lebanon's request.

Because this artifact was seized pursuant to a warrant, Criminal Procedure Law §690.55 authorizes the Court issuing the warrant to determine its ultimate disposition. Toward that end, Mr. Lederman and I met informally with the issuing judge, the Honorable Daniel P. FitzGerald of the New York Supreme Court, agreeing to establish a schedule for each of us to submit motions. That proceeding is now before Judge FitzGerald.

Respectfully,

A handwritten signature in black ink, appearing to read "CH", is written over a horizontal line.

Christopher Hirsch *for*  
Matthew Bogdanos  
Assistant District Attorney  
212 335-9323

CC *via e-mail*: Georges Lederman, Esq.

Republic of Lebanon



The Minister

Mr. Matthew BOGDANOS  
Senior Trial Counsel  
New York County District Attorney's Office  
One Hogan Place, NY NY 10013

Ref.: 2115/2017  
Beirut, 18-7-2017

Dear Mr. Bogdanos,

The Lebanese Ministry of Culture's Directorate General of Antiquities has been informed that the District Attorney of New York County has seized a marble Bull's Head on 7 July 2017, from the Metropolitan Museum of Art. This object was stolen and illicitly exported from Lebanon, specifically from the DGA's warehouse in Byblos in August 1981.

In contravention of our national patrimony law (Antiquities Law no. 166 LR dated November 7, 1933, articles 5 and 10), we respectfully demand its immediate return.

The Ministry of Culture's Directorate General of Antiquities looks forward to working together with the United States Government to achieve the restitution of the Bull's Head to Lebanon in furtherance of the cooperation between our two governments in matters of both law enforcement and cultural heritage. Should you need further information, please do not hesitate to contact Mr. Sarkis El Khoury, the DGA's Director General at +961 3 70101519, [sarkis.khoury@dga.culture.gov.lb](mailto:sarkis.khoury@dga.culture.gov.lb), or Ms. Anne Marie Afeiche, Curator of the National Museum of Beirut at +961 3 434361, [annemarie.afeiche@dga.culture.gov.lb](mailto:annemarie.afeiche@dga.culture.gov.lb).

Thank you in advance for your cooperation.

Sincerely,

Dr. Ghattas KHOURY



Minister of Culture